

SITE NAME:

TRANSFORMER DISPOSAL AREA SUPERFUND SITE

DATE:

July 25, 1994 POLREP #1

SUBJECT: LOCATION:

COVENTRY/WEST GREENWICH, RI

POLLUTANT:

POLYCHLORINATED BIPHENYL (PCB)

OCCURRENCE DATE:

DECEMBER 1991

MEDIA AFFECTED:

SOIL

SEVERITY:

POTENTIALLY MAJOR

CATEGORY:

INLAND/NONTRANSPORTATION

SOURCE/CAUSE:

MIDNIGHT DUMPING

CERCLIS ID #:

RID987492618

SITE ID NUMBER: **REGION:** 

Y2

osc:

PAUL R. GROULX

US ENVIRONMENTAL PROTECTION AGENCY SITE EVALUATION & RESPONSE SECTION I

EMERGENCY & RESPONSE BRANCH

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LATEST POLREP:

INITIAL

#### I. Background

The property, identified as the Transformer Disposal Area Site (Site), is located on a 14.2-acre parcel of undeveloped wooded land on the Coventry/West Greenwich town line. Ten acres of the 14.2-acre plot lie in West Greenwich, while the remaining 4.2 acres are in Conventry. Two areas of PCB contamination have been identified on the Site: one area in West Greenwich, and the other area in Coventry.

The property has been owned by the same family since 1798. the family's intent to keep the property preserved in its original and natural condition.

In December 1991, as a result of scrap metal recovery and salvage operations being performed at a mill complex in Providence, Rhode Island, several out-of-service transformers containing polychlorinated biphenyls (PCBs) stored at the mill were transported to and improperly disposed of at the Site. transformers were loaded onto a pickup truck at the mill complex and driven South on Interstate Route 95. After entering an inactive gravel pit access road off the interstate, the transformers were hauled about a quarter of a mile into the nearby woods where they were discarded on the Site.

February 25, 1992 - The Rhode Island Department of Environmental Management (RIDEM) conducted an emergency response and removal of three transformers improperly disposed of on separate areas of the Site. On March 6, 1992, RIDEM continued removal activities and excavated stained soil visible in two of the three disposal

areas. Soil samples collected by RIDEM on March 6, 1992 indicated that PCB contaminated soil still existed at the Site.

Subsequently, RIDEM personnel conducted a Preliminary Assessment (PA) of the Site on May 12, 1993. RIDEM personnel reported the presence of a chemical odor in the vicinity of one of the excavated areas. Based on the results of the PA, the Site was referred to the EPA for further investigation.

## II. Action

At the request of RIDEM, a Removal Site Investigation was performed by the U.S. Environmental Protection Agency (EPA) Emergency Planning and Response Branch (EPRB) on September 2, 1993. During the EPA Preliminary Assessment/Site Investigation (PA/SI), surface soil samples were collected for suspected PCB contamination. Field screening by Gas Chromatography/Electron Capture Detector (GC/ECD) indicated the presence of PCBs at elevated levels at two of the areas. PCBs were identified at a maximum concentration of 200,000 parts per million (ppm).

February 15, 1994 - The EPA Removal Site Investigator issued a Site Investigation Closure Memorandum. The Removal Site Evaluation has lead to the determination that a time-critical Removal Action is appropriate for the Site.

March 7, 1994 - EPA's EPRB and the Roy F. Weston, Inc. Technical Assistance Team (TAT) initiated a Comprehensive Site Investigation (CSI). This additional sampling and investigation will be used to define the extent and depth of contamination, and to determine the appropriate methods to mitigate the potential threats posed by the contamination at the Site.

The analytical results from the sampling survey confirmed previous data that indicated PCB contaminated soil remains in the two areas where RIDEM conducted the initial soil excavations. Extensive soil sampling was conducted in these two areas in order to define the extent of contamination. The analytical results obtained from these samples, along with the analytical results obtained during the PA/SI conducted by EPA on September 2, 1993 were incorporated into the CSI.

In a letter dated March 31, 1994, EPA notified the property owners of their status as potentially responsible party (PRP) at the Site. They are claiming innocent landowner and have indicated in a letter dated May 3, 1994 that they had no prior knowledge and were not aware of any dumping on their property.

As a result of joint effort by the Criminal Investigation Division of the EPA, the RIDEM, as well as federal and state

prosecutors, the owner of the mill complex and the individual who assisted in the improper disposal of the transformers were each convicted on two counts for unlawfully disposing of PCBs and two counts for failing to report a release of PCBs into the environment. One individual was sentenced to a 27-month prison term. As a result of an appeal, the other individual is awaiting sentencing.

June 15, 1994 - The Action Memorandum was signed by the Regional Administrator approving the proposed removal action at the Site.

The Removal Action includes maintaining existing temporary fencing and signs placed by the RIDEM, and maintaining site security at the Site until the project is completed.

July 1, 1994 - Roy F. Weston completed the CSI to be utilized in determining the extent of PCB contamination at the Site.

The removal consists of the following:

\*removal of contaminated soils which contain hazardous materials based on the CSI.

\*Perform appropriate cleanup levels at the Site, in accordance with 40 CFR 761, Subpart G, Article 761.123 (4)(v), PCB cleanup Policy, all surface soils presently above 10 ppm by weight shall be excavated, providing that the soil is excavated to a minimum of 10 inches. If further contamination exists, further excavation or capping will be considered.

\*All materials will be disposed of in accordance with EPA CERCLA Off-Site Policy (OSWER 9834-11).

At present, off-site landfill will be utilized as the primary form of disposal for these wastes. Soil will be loaded in intermodel rolloff cans, polylined, covered with a secure cover, shipped by truck to the Worcester Massachusetts Railyard, loaded onto railcars owned by Union Pacific Rail Lines, and delivered to Envirosafe Services of Idaho, Inc., located in Grandview, Idaho.

July 18, 1994 - OHM Remediation Corporation, the EPA ERCS prime contractor, mobilized to the Site to commence the removal action.

The following companies have been subcontracted to support the ERCS prime contractor:

Envirosafe Services - Oregon, Ohio R.I. Analytical Laboratory - Warwick, RI Certified (Aqua) Laboratory - Weymouth, MA Professional Security - West Greenwich, RI Scituate Porta-John, Scituate, RI Rentals Unlimited, Hopkinton, MA August 3, 1994 - The soil excavation is 80% completed. A total of six roll-offs containing approximately 120 cubic yards of soil have been excavated.

Cleanup excavation is proceeding at a slower rate than originally projected due to temperatures reaching 100 degrees in the shade with high humidity during the past 14 days.

August 5, 1994 - The initial soil excavation has been completed. Twelve Intermodel roll-offs have been loaded with excavated soils. During Site activities, the OSC observed a large new pocket of contaminated soil in high concentration. This pocket has changed the scope of work and the extent of the project. The project will be shut down during the week of 8/8 thru 8/15 to reassess the situation and to coordinate additional resources to support the added tasks.

## III. Financial

June 17, 1994 - The Purchase Request was signed by the Regional Administrator authorizing \$200,000 for the Removal Action.

June 17, 1994 - The Delivery Order was issued to the ERCS prime contractor, OHM Remediation Services Corp., for \$200,000 to commence the removal action at the Site.

	CEILING	OBLIGATION	BALANCE
ERCS	\$300,000	\$160,328	\$139,672
TAT	\$ 88,000	62,000	\$ 26,000
CONTINGENCY	\$ 82,000	\$0	\$ 82,000
INTRAMURAL	\$ 60,000	\$ 22,000	\$ 38,000
TOTAL	\$530,000	\$244,328	\$285,672

TOTAL PROJECT CEILING: \$530,000

August 1, 1994 - The OSC has requested an increase for \$50,000 for an increase to the existing ERCS Delivery Order.

### IV. Future Plans

The OSC estimates that work on-site will take an additional three to four weeks to complete due to the recently identified large high concentration of PCB pocket that was not anticipated.

CASE PENDS

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# POLREP DISTRIBUTION LIST

Polrep #:1 Project: Transformer Disposal Area Site August 5, 1994 Coventry/West Greenwich, RI

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Lx	Berger	Lx	Carlson
Lx	Conley	Lx	Dever (Enf Coord)
Bx	Enforcement Files	Lx	Novick
Lx	O'Halloran	Lx	Porteous
Lx	Wallace	Lx	Verdone
x	Office File (w/Original Distribution List)		
Bx	OSC (w/Copy of Distribution List)		

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